

COMMONWEALTH OF MASSACHUSETTS

DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

Investigation by the Department on its Own Motion as to the Propriety of the Rates and Charges Set Forth in the Following Tariffs: M.D.T.E. Nos. 14 and 17, filed with the Department on December 11, 1998, to become effective January 10, 1999, by New England Telephone and Telegraph Company d/b/a Bell Atlantic-Massachusetts

DTE 98-57

AT&T's seventh SET OF INFORMATION REQUESTS
TO BELL ATLANTIC

AT&T Communications of New England, Inc. and its affiliated companies, Teleport Communications Boston and ACC National Telecom Corp. hereby submit the following information requests to New England Telephone and Telegraph Company d/b/a Bell Atlantic-Massachusetts ("BA-MA" or "Bell Atlantic"). Please provide responses to these requests as they are completed.

Instructions

Each request should be answered on a separate page preceded by the request and by the name of the person responsible for the answer.

Please provide answers as they are completed.

These requests shall be deemed continuing so as to require supplemental responses if BA-MA subsequently receives or becomes aware of additional information responsive to these requests.

If an answer refers to BA-MA's response to another information request in this proceeding, please provide that response with the answer.

If BA-MA cannot answer a request in full, answer to the extent possible and state why BA-MA cannot answer the request in full.

If BA-MA refuses to respond to any request by reason of a claim of privilege, state the privilege claimed and the facts relied upon to support the claim of privilege.

Unless otherwise stated, these requests concern BA-MA's Massachusetts intrastate operations.

Definitions

"Surrebuttal testimony of John Howard" refers to that testimony of John Howard which was filed in D.T.E. 98-57 on November 22, 1999.

"Affidavit of Sheila Gorman" refers to the affidavit attached as Exhibit B to the surrebuttal testimony of John Howard.

The terms "and" and "or" should be construed either conjunctively or disjunctively so as to require the most complete response.

Information Requests

1. Please refer to page 1 of the exhibit attached to the affidavit of Sheila Gorman. Please provide the "MA DPU 94-185, Tab 2B, Pg 3 Source" referenced in line 1. Additionally, please provide any backup documentation to substantiate the local usage percentages presented in Box 1 Line 1 of the exhibit.

Untitled

2. Please refer to page 1 of the exhibit attached to the affidavit of Sheila Gorman. Please provide all of the supporting work papers for the "Estimate" used to develop the CLEC Traffic Characteristics Usage presented in Box 2 Line 1 of the exhibit. If not apparent on the work papers, please describe the assumptions and methods that were used.

3. Please refer to pages 2-4 of the exhibit attached to the affidavit of Sheila Gorman. Please provide the MCS VI source material used to substantiate the rates presented in pages 2-4 of the exhibit.

4. Please refer to page 2, line 2(e) of the exhibit attached to the affidavit of Sheila Gorman. Please provide a definition of "Line Haul Units." This definition should include, but not be limited to, the unit of measure used. Specifically, please indicate whether these units are miles, quarters of miles, or some other linear measurement. Please provide an explanation of how you came up with the estimated figure of 6.33. Also provide any backup documentation available to support this estimate, including all assumptions and calculations.

5. Please refer to page 2, line 3(e) of the exhibit attached to the affidavit of Sheila Gorman. Please specify whether the definition of "Line Haul Units" is the same for this line as the definition provided in response to question 4 above. If the definition is not the same, please provide the definition. Please provide an explanation of how you came up with the estimated figure of 12.66. Also provide any backup documentation available to support this estimate, including all assumptions and calculations.

6. Please refer to page 3, line 2(e) of the exhibit attached to the affidavit of Sheila Gorman. Please provide a copy of the "Special Study." Please also provide a definition of the term "Special Study," including, but not limited to, the type of study conducted, the date(s) such study was conducted, the methodology used for such study, the participants who were involved in conducting such study, and the number of person hours required to conduct and complete such study. Also, please specify whether the definition of "Line Haul Units" is the same for this line as the definition provided in response to question 4 above. If the definition is not the same, please provide the definition. Please provide an explanation of how you came up with the estimated figure of 58. Also provide any backup documentation available to support this estimate, including all assumptions and calculations.

7. Please refer to page 4, line 3(h) of the exhibit attached to the affidavit of Sheila Gorman. Please provide a copy of the "Special Study." Please also provide a definition of the term "Special Study," including, but not limited to, the type of study conducted, the date(s) such study was conducted, the methodology used for such study, the participants who were involved in conducting such study, and the number of person hours required to conduct and complete such study. Also, please specify whether the definition of "Line Haul Units" is the same for this line as the definition provided in response to question 4 above. If the definition is not the same, please provide the definition. Please provide an explanation of how you came up with the estimated figure of 48. Also provide any backup documentation available to support this estimate.

Respectfully submitted,

AT&T COMMUNICATIONS

OF NEW ENGLAND, INC.

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